Overview

This Frequently Asked Questions (FAQ) document is an introduction to the Common Origination and Disbursement (COD) process. It updates the COD FAQs posted to the IFAP web site on December 23, 2004.

Schools, third party servicers, and software providers can find detailed processing requirements and business rules in the 2003-2004, 2004-2005, and 2005-2006 COD Technical References at: https://www.fsadownload.ed.gov/docsStudentAidGateway.htm/.

The COD Technical Reference contains key information to assist with the development and implementation of financial aid systems/software that will interface with the COD System. For 2003-2004 and 2004-2005, this reference is for both COD Full Participants and Phase-In Participants and contains separate Pell and Direct Loan volumes specifically for Phase-In Participants. Starting with 2005-2006, the COD Technical Reference is for Full Participants only since *all* schools musts process as Full Participants with the COD System beginning with the 2005-2006 Award Year.

The FAQs are organized into the following sections:

Common Origination & Disbursement Basics
Tips for Full Participants
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Sending/Receiving Data in the COD Environment
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Common Origination & Disbursement Basics

What is Common Origination and Disbursement (COD)?
Common Origination and Disbursement (COD) is a streamlined method for processing, storing, and reconciling Pell Grant and Direct Loan financial aid data. The COD System was implemented in and has been processing records since April 2002 for Pell Grant and Direct Loan records. The COD System integrated the origination and disbursement processes for Pell Grants and Direct Loans that were previously performed by the Recipient Financial Management System (RFMS) and the Direct Loan Origination System (DLOS).

What kind of COD training is available to schools?

Schools have the opportunity to participate in a variety of training about COD including:

> ➢ Computer based training (CBT) available on the IFAP web site at:
> http://www.ifap.ed.gov/eannouncements/0408CODUpdateCBTWebsiteMarch04.html
>
> ➢ FSA's annual Electronic Access Conferences (EACs) in November and December 2004.
> The latest COD information and training will be presented at these conferences including
> updates for the 2005-2006 Award Year.
>
> ➢ Schools may also access the Department of Education's Schools Portal web site,
> http://fsa4schools.ed.gov/SCHOOLSWebApp/index.jsp, for additional information on
> upcoming COD events and training opportunities.

How do I send records to COD?

Schools have the option of sending their records to COD as either a Full Participant or Phase-In Participant.

The term Full Participant applies to schools that use the Common Record in XML format to submit Pell Grant and/or Direct Loan origination and disbursement data to the COD System by sending batches via the Student Aid Internet Gateway (SAIG), or by utilizing the COD web site. For the 2003-2004 Award Year and forward, schools that use EDExpress for Pell Grants and/or Direct Loans are COD Full Participants.

The term Phase-In Participant applies to schools that use fixed-length files to submit Pell Grant and/or Direct Loan origination and disbursement data to the COD System by sending batches via the Student Aid Internet Gateway (SAIG), or by utilizing the COD web site. All schools must be Full Participants by the 2005-2006 Award Year.

Schools that use third party servicers should consult with their servicers about specific software package capabilities and features prior to sending data to COD.

Did COD change the way schools receive funding for Pell Grant and Direct Loans?

Schools continue to receive funds the same way they did prior to COD implementation. For example: Pell Grant schools that participated in the Just-in-Time (JIT) program will continue in COD with the same JIT process. Advance pay schools continue to have the ability to draw down funds prior to submission of detailed student records. However, beginning with the 2002-2003 Award Year, the COD System implemented a funds management enhancement that allows FSA to better manage Title IV funds. Schools may continue to submit disbursement records 30 days (for Pell) and 7 days (for Direct Loan) in advance of the disbursement date, but COD will not make additional funds available until seven days prior to the disbursement date on the student record.

What are some benefits of the COD process?

The COD System offers schools several benefits and flexibility in establishing processing parameters that meet individual school needs. The following are some benefits of the COD process:

➢ *Student-centric view:* All schools have an expanded ability to access student financial aid history online via a secure Internet accessible web site. Schools can view Pell Grant and Direct Loan data for a single student on one COD web screen.

➢ *Less data to report:* Full Participants enjoy the benefit of the XML Common Record that requires only the student identifier information necessary to match to the proper record and the data required to process the business requirement. Full Participants no longer have to submit an entire fixed length record in order to update a data element.

➢ *Choice of "edit-only" or "actual" disbursement options:* All schools are able to send "edit-only" records. Anticipated Disbursements sent as part of an "edit-only" record will not be posted to the student's award (grant or loan). This will not influence the amount of money available to the school, unless the disbursement release indicator (the disbursement release indicator is a field on the Common Record that designates a record as an Actual Disbursement Record for Full Participants) on that record is later changed to "true", or an actual disbursement record is received (for Phase-In Participants).

   Additional information regarding disbursement options is available in the 2003-2004 & 2004-2005 COD Technical References at:
   https://www.fsadownload.ed.gov/docsStudentAidGateway.htm.

➢ *Option to have COD initiate drawdowns on the school's behalf:* Direct Loan Schools that are eligible to participate in the advance payment funding method may choose to have COD initiate drawdowns on their behalf, based upon accepted actual disbursement records.

➢ *Enhanced Cash Management Tools:* The COD System tracks and monitors schools' record reporting behavior and how quickly and accurately schools report records against their drawn cash. All financial aid offices and business offices can use the COD web site functionality to chart their own progress using the same information available to FSA, schools, third party servicers, and COD customer service.

➢ *Easier to reconcile:* The COD System enables smooth and timely reconciliation by tracking and monitoring each school's drawdowns, reporting, and data corrections. This enables COD customer service and FSA to work with schools to avoid and resolve reconciliation problems.

➢ *COD customer service:* COD provides a single point of contact for customer service for Direct Loan and Pell Grant processing. Since spring 2003, COD customer service provides support for "RFMS" years (1999-2000 through 2001-2002) as well as "COD" years. COD customer service will continue to provide support for Direct Loan "COD" years. COD customer service provides each school with primary customer support staff who monitor their schools' reporting, including record rejects, drawing funds, and

progress toward reconciling. Customer service staff work directly with schools and third party servicers to resolve problems.

➢ *Streamlined process for requesting and reporting data:* Full Participants can use the flexibility of the Common Record to report a student's Pell Grant and Direct Loan award and disbursement data on a single XML record.

➢ *Access to information:* The COD web site is like a "personal Customer Service Representative (CSR)", ready to assist schools 24/7. The COD web site provides schools access to aggregate information across the Pell Grant and Direct Loan programs, providing a comprehensive view of the school's transaction and funding information. Schools are also able to select various processing options to best suit their needs.

➢ *Faster turnaround times:* COD provides faster turnaround time for data submitted to FSA for processing. COD processes web transactions in real time and batch transactions many times per day.

How often is the COD System changed?
The COD System is updated annually to implement new award years. Additionally, changes and/or updates to the COD System may occur during an award year as needed. The latest information on new and updated features to the COD System is posted on the IFAP web site at http://www.ifap.ed.gov/eannouncements/0714AddlCODSysImp0405.html

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Do Federal Family Education Loan (FFEL) schools have an option of whether they are Full Participants or Phase-In Participants?
Full Participant and Phase-In Participant status relates only to schools that participate in the Pell Grant and/or Direct Loan programs. FFEL program schools that participate in the Pell Grant Program may be Full Participants or Phase-In Participants for the 2004-2005 Award Year; however, they must become COD Full Participants for their Pell Grant processing by the 2005-2006 Award Year. FFEL Program schools continue to send their loan records directly to their lenders, guaranty agencies, or servicers and do not send them to the COD System.

The Common Record was developed in partnership with members of the National Council of Higher Education Loan Programs (NCHELP) and the Postsecondary Electronic Standards Council (PESC). This collaborative effort enables the Common Record to bring consistency and standardization to the transmission of student financial aid data. The Common Record provides a structure to allow for the addition of FFEL data. Thus, the inherent processing efficiencies of the COD process will also be available to FFEL schools as the FFEL trading partners adopt the Common Record format.

I've seen FSA presentations that discussed COD using a new computer technology. What is the new technology?
FSA has incorporated into the COD process a variety of technologies that speed transaction processing and provide other enhancements to schools. Of particular note is Extensible Markup Language (XML).

> *XML:* XML is the computer language COD uses for processing the Common Record and for web applications. XML uses data elements, like COBOL, BASIC, and other computer languages; however, XML is more flexible and efficient.
>
> In COD, XML flexibility enables schools to send only the minimum amount of data elements required for a business action, rather than an entire fixed-length record. Using the XML-coded Common Record allows schools to submit multiple types of data for more than one student and award year without creating individual unique fixed-length records.

> *Middleware/Electronic Application Interface (EAI BUS):* The EAI BUS acts as a bridge between schools, interfacing systems, and the COD System. The EAI BUS is also referred to as "Middleware". It transmits information from a school's SAIG mailbox to COD and vice versa. Currently, the EAI BUS translates XML (Common Record) response documents generated by COD into fixed-length acknowledgment records for Phase-In Participants.

What resources can schools refer to for information on the Common Record and fixed-length record layouts?
Full Participants can refer to the XML Schema. In basic terms, an XML Schema describes how the Common Record is laid out, and is the definitive guide that specifies the rules surrounding the logical structure of an XML (Common Record) document. The XML Schema displays the appropriate elements and content associated with the Common Record, and the order in which they appear.

The XML Schema for the 2003-2004 Award Year is available on the IFAP web site at: http://ifap.ed.gov/cod/0210XMLCommonRecordSchema20c.html. The 2004-2005 XML Schema is also available for schools on IFAP at: http://www.ifap.ed.gov/cod/COD0405CRXMLSchema20d.html.

Full Participants and Phase-In Participants can also refer to the 2003-2004 & 2004-2005 COD Technical References- Volumes II, III, & IV Section 3, http://www.fsadownload.ed.gov/docsStudentAidGateway.htm, for information on the Common Record layout and fixed-length record layout.

What are some XML online resources that are available to schools and servicers?
Some online resources schools and third party servicers can review for information on XML include the following web addresses:
http://www.w3.org
http://www.ebXML.org
http://www.oasis-open.org
http://www.pesc.org
Sun's XML Java Technologies: www.java.sun.com/features/1999/03/xml.html
The XML Industry Portal: www.xml.org/xml/resources_cover.shtml
XML Software: www.xmlsoftware.com
Web reference-Exploring XML: www.webreference.com/xml/
XML Information: www.xml.com/index.csp
The XML FAQ: www.ucc.ie/xml

Does the Department of Education provide an XML translator (file converter)?
No. The Department does not own an XML translator. FSA does not plan to obtain a translator in the future.

How do schools obtain prior Award Year Pell Grant and Direct Loan information now that RFMS and DLOS are retired?
FSA has migrated all RFMS origination and disbursement data for award years 1999-2000 through 2001-2002 to COD. COD is now processing Direct Loan Archived Data for award years 1997-1998 and forward. As a result, schools have to access only one system (COD) to request data and report changes.

Both Pell Grant disbursement, and Direct Loan origination and disbursement data continues to be available in the National Student Loan Data System (NSLDS). In addition, Direct Loan data will continue to be accessible via the Direct Loan Servicing System (DLSS). A COD User Name and Password is required to access both the COD and Direct Loan Servicing web sites (Single Sign-on). If you do not have a COD User Name and Password, you will not be able to access the DLSS website. Refer to Direct Loan Bulletin 03-40 for additional information, http://www.ifap.ed.gov/dlbulletins/DLB0340.html.

How do schools, third party servicers, and software developers obtain information about COD processing issues?
Schools, third party servicers, and software developers can obtain information about current production issues, news, and COD System functionality through various channels such as the COD web site, http://www.cod.ed.gov/, and the IFAP web site, http://www.ifap.ed.gov. The following communication sources provide information to COD users:

➢ *COD Web Messages:* COD posts messages on the COD web site that provide users with information about COD processing, maintenance, holiday schedules, and new release functionality.

➢ *COD Processing Updates:* The COD Processing Update for Direct Loan and Pell Grants provides information on COD processing issues as well as reminders and helpful hints. It is published on the COD web site daily by 12:00 noon (ET). Detailed information regarding the COD Processing Update is available on IFAP at: http://www.ifap.ed.gov/eannouncements/0905CODUPDT.html

Each Friday the COD Processing Update for Direct Loan and Pell Grants is posted as an Electronic Announcement on the IFAP web site, www.ifap.ed.gov. If you have not done so already, COD encourages you to become an IFAP subscriber. IFAP subscribers can choose to receive a daily and/or weekly e-mail informing them when publications have been posted to IFAP. In order to subscribe to IFAP:

1) Go to the IFAP web site, www.ifap.ed.gov.
2) Click on the *Member Services* link, located in the blue bar on the bottom left side of the IFAP web site. The next screen will display Username and Password fields.
3) Click on the *Click Here to Register* link located under the Login button. This brings you to the *IFAP User Registration* screen.
4) On the *IFAP User Registration* screen, enter your information into the required fields. Click on the Submit Registration tab at the bottom of the IFAP Registration screen.

Once you are an IFAP subscriber, you can customize your notification by going back to the *Member Services* area of the IFAP web site and selecting the *Subscription Options* link to customize your subscription.

If you have any questions about the IFAP Subscription Notification, please contact the Customer Service Call Center at 800/433-7327 between 9:00 A.M. – 5:00 P.M. (ET). Questions can also be e-mailed to: fsa.customer.support@ed.gov.

➢ *Electronic Announcements:* Electronic Announcements are frequently posted on the IFAP web site. These announcements provide updates on COD processing, functionality, and program requirements that affect both the Direct Loan and Pell Grant programs as well as updates that affect only the Pell Grant Program.

➢ *Direct Loan Bulletins*: Direct Loan Bulletins are frequently posted on the IFAP web site. These bulletins provide updates on processing, functionality, and program requirements that affect the Direct Loan Program.

➢ *Pmessage (Pell Grant Message):* Pmessages are placed in schools' SAIG mailboxes. These messages provide updates on processing, functionality, and program requirements that affect the Pell Grant Program.

What process is used to resolve COD System Issues?
Every COD System issue is reviewed and prioritized based on several impact criteria, including the number of students affected, the number of schools affected, and how the issue affects school funding. This method ensures resources are being focused on the overall critical areas.

When you report concerns to the COD School Relations Center via e-mail or phone, include specific examples of the issue and how the issue impacts your school and/or students. This information is forwarded to the issue resolution team and assists with the resolution and prioritization process.

Updates to priority issues are displayed in the COD Processing Updates. Updates on individual issues are passed to you through your Customer Service Representative.

Tips for Full Participants

How does my school become a Full Participant?
Schools are encouraged to notify the COD School Relations Center as soon as possible of their decision to become a Full Participant by submitting a Full Participant Request letter to the COD School Relations Center. COD uses the information in the Full Participant Request letter to set processing flags and options for Full Participants that ensure Full Participant records are processed correctly. Please keep in mind the COD School Relations Center cannot make changes to a school's participation status without a valid signature from the school on school or corporate letterhead.

If you processed as a Full Participant for the 2003-2004 Award Year and want to continue processing the same way in 2004-2005, you do not need to take any action. However, if there is a change in your participation type for either program, you must notify the COD School Relations Center by submitting the Full Participant Request letter indicating those changes.
All school must be Full Participants for the upcoming 2005-2006 award year. Updated information regarding Full Participant sign up for the 2005-2006 Award Year is posted on the IFAP website at
http://www.ifap.ed.gov/eannouncements/0806CODFullParticReq0506.html/**.**

Note: Schools planning to use EDExpress in 2004-2005 must complete a Full Participant Request letter ONLY if they did not use EDExpress in 2003-2004 (and are not established as Full Participants in COD). All schools must be Full Participants by the 2005-2006 Award Year.

Schools may contact CPS/SAIG customer service at 800/330-5947, or e-mail cpssaig@ed.gov for assistance with EDExpress.

When must schools become Full Participants?
All schools must become Full Participants with COD by the 2005-2006 Award Year. This means that all schools, software providers, and third party servicers must be able to send and receive the XML (Common Record) format. COD will not support fixed-length records beginning with the 2005-2006 Award Year.

EDExpress users who use the Pell Grant or Direct Loan modules are automatically Full Participants. However, EDExpress schools that are not registered as Full Participants in COD must submit a Full Participant Request Letter before transmitting records to COD to ensure that COD processes their records correctly. If a school submits records using EDExpress software for 2003-2004, 2004-2005 or 2005-2006 and COD does not reflect Full Participant status for that school, the records will reject.

By when must my school submit its Full Participant Request Letter for the 2005-2006 Award Year?
We encourage your school to mail or fax its Full Participant Request Letter to the COD School Relations Center as soon as possible. Doing so will assist us in preparing the COD System to accept and process your school's 2005-2006 Pell Grant and/or Direct Loan data.

What is the consequence of not signing up as a Full Participant for the 2005-2006 Award Year?
If your school does not sign up as a Full Participant for the 2005-2006 Award Year and submits 2005-2006 Pell Grant and/or Direct Loan data in flat-file legacy formats, the COD System will reject the data.

How are schools notified of their Full Participant Status once a Full Participant Request Letter has been received and processed by COD?
Upon receipt of a Full Participant Request Letter, the school is sent a Full Participant Confirmation Letter and a Routing ID Letter. These letters confirm that the school is set up to process as a Full Participant in the COD System.

My school uses EDExpress. What are my processing options for the 2004-2005 Award Year and forward?
Users of 2004-2005 EDExpress for Pell Grant and/or Direct Loan processing are considered Full Participants, and will submit their Pell Grant and/or Direct Loan data via an XML Common Record. All schools that intend to transmit records to COD using EDExpress Software version 2.0 in 2004-2005, and have not used EDExpress in previous award years, are required to register as Full Participants with the COD School Relations Center prior to transmitting 2004-2005 records.

EDExpress users are able to take advantage of some of the enhanced processing options available to Full Participants such as the opportunity to send student level award data from both programs together in one submission. The COD Technical Reference for award year 2004-2005 (and subsequent award years), Volumes II & V, http://www.fsadownload.ed.gov/CODTechRef0405.htm provides technical information regarding the Common Record process and guidance for using EDExpress.

EDExpress users are encouraged to download the latest version of EDConnect (6.0) for transmitting information via the Common Record to COD. For more information refer to the Electronic Announcement posted on the IFAP web site at: http://www.ifap.ed.gov/eannouncements/0414EDconnectver60.html.

Are there resources to which my school can refer in evaluating its Full Participant solution?
Your school can refer to the following sections of the 2004-2005 COD Technical Reference (http://www.ifap.ed.gov/cod/0405CODTechRefDraft.html/) for information that may be helpful in determining its Full Participant solution:
- Volume I, Section 3 provides information about XML.
- Volume II, Section 1 and Volume V, Section 1 provide information about how to use FSA's EDExpress software to submit data to the COD System in combination with another system or another software.

What are the benefits of being a Full Participant?
The COD process benefits all schools, but Full Participants have additional flexibility not available to Phase-In Participants. However, your Institution's software may not be coded to allow you to take advantage of all the processing benefits COD provides.

- *Common Record submission:* The ability to submit a Common Record that can transport data for one or multiple schools, students, Program awards and Award Years, for the Pell Grant and Direct Loan Programs between the school and COD.
- *COD online update:* The creation and editing of Pell Grant and Direct Loan award and disbursement data online via the COD web site.
- *Less data to report*: Although ALL Full Participants must provide the data elements required to process a business function, some Full Participants, dependent on their software, may not have to send a complete record to report a change in one data element. This is supported via batch and online processing.
- *Record processing options:* The ability to select processing options based upon the needs of the institution. Examples of these options include:
    - Setting a Pell Grant processing parameter to reject a record or correct data to continue processing (for example, Pell award amount).
    - Setting a parameter that tells FSA to print Direct Loan promissory notes on the school's behalf.

Will a school automatically be considered a Full Participant once a third party servicer begins transmitting XML records on the school's behalf?
No. Schools must first individually sign up in order to be a Full Participant. COD must set processing flags and options for Full Participants in order to ensure their records are processed properly. School must confirm their Full Participant status by submitting a Full Participant Request letter to the COD School Relations Center. Failure to notify the COD School Relations Center before a third party servicer begins submitting records on the school's behalf will cause their records to reject.

Once our school is a Full Participant, will we have limited functions in COD because we use a third party servicer?
No. Schools will not be limited in any way using the COD System because a third party servicer creates and submits their records. Once a school is set up as a Full Participant and has access to the COD web site, they will be able to perform the same functions as a third party servicer.

Schools should carefully coordinate any entries/changes made on the COD web site with their third party servicer to ensure that all parties involved are aware of what data is entered/changed in COD through the web site.

Can a school "back out" from Full Participant status after being registered as a Full Participant in COD?
Yes. A school has the option to "back out" and return to Phase-In status at anytime prior to processing. However, once a school transmits the COD XML Common Record to COD, the school cannot switch to the fixed-length record. Schools that need to "back out" should contact the COD School Relations Center as soon as possible

Will COD process batches that contain improper fixed-length or XML formats?
Batches submitted to COD containing improper fixed-length or XML formats will not be processed or displayed on the COD web site. COD customer service takes a proactive approach in contacting and assisting schools in this situation. Customer service notifies the school that the batch was not processed and provides the school with the reason and action required to correct the batch.

What is the COD Routing ID?
As part of an initiative to establish a common school identifier across Title IV delivery systems, FSA began assigning new identifiers to COD Full Participants in 2002-2003. This new identifier, formerly known as the Common School Identifier or CSID, has been renamed the "Routing ID" and is used for 2002-2003 and forward.

The Routing ID is an eight (8) character, numeric key that is randomly generated. The values in the key do not signify any information about your school except its identity. While a Routing ID

has been established for all postsecondary schools and third party servicers submitting Pell Grant and/or Direct Loan records, *only COD Full Participants actively use the Routing ID.*

Full Participants must use the Routing ID when submitting Common Records to COD. Note: The Routing ID is used in the four required Entity ID tags in the Common Record: Source Entity ID, Destination Entity ID, Reporting Entity ID, and Attended Entity ID. Additional information is available in the 2003-2004 & 2004-2005 COD Technical References at: https://www.fsadownload.ed.gov/docsStudentAidGateway.htm.

Note: For the 2003-2004 Award Year and forward, EDExpress users are required to populate "Entity ID" fields on the Pell Grant and Direct Loan setup screens in EDExpress. The Entity ID fields must be populated with a valid Routing ID. Populating the Entity ID fields correctly is crucial in ensuring that Pell Grant and Direct Loan data exported to COD via EDExpress can be identified and processed accurately. For more information on how to set up EDExpress refer to the posting on IFAP at: http://www.ifap.ed.gov/eannouncements/0507CODEDERoutingIDs.html.

Customer Service

Who do I contact when I need assistance with COD?
Schools, third party servicers, and software developers may contact the COD School Relations Center, by phone or e-mail, with questions regarding COD. Customer service representatives are available Monday through Friday, 8:00 A.M. - 8:00 P.M. (ET) at: 800/4PGRANT for the Pell Grant Program or 800/848-0978 for the Direct Loan Program. Customer service may also be reached via e-mail at: CODSupport@acs-inc.com.

Does my school have a primary customer service representative (CSR)?
Yes. The COD School Relations Center has assigned a primary customer service representative (CSR) to each school. COD customer service representatives are available to:
  ➢ Answer COD processing questions about the Pell Grant and Direct Loan programs.
  ➢ Assist in obtaining access to the COD web site as well as provide tips on web site navigation. The COD web site is a great tool for processing and viewing Pell Grant and Direct Loan data.
  ➢ Assist in Full Participant registration (for schools that have not been set up in COD as a Full Participant).
  ➢ Assist with any additional concerns or questions regarding COD.

How do schools reach their primary CSRs?
Contact the COD School Relations Center at 800/4PGRANT for the Pell Grant Program or 800/848-0978 for the Direct Loan Program. COD customer service is available Monday through

Friday, 8:00 A.M. - 8:00 P.M. (ET). When prompted, enter the school's Pell Grant-ID or Direct Loan School ID and the call will automatically be routed to the school's primary team. At this point schools can ask to speak with their primary CSR. If a member on the school's primary team is not available, the call will be routed to the appropriate backup. A voice mail message may also be left with COD customer service. Schools can also e-mail COD customer service at: CODSupport@acs-inc.com.

Do third party servicers and software providers have a primary CSR?
COD has assigned primary CSRs to third party servicers and software providers. To speak with a primary CSR call the COD School Relations Center at: 800/4PGRANT for Pell Grants or 800/848-0978 for Direct Loans. Third party servicers and software providers can enter their school's Pell Grant-ID or Direct Loan School Code. If a school code is not entered when prompted, the call will then be routed to the next available representative.

What support does COD customer service provide schools?
The COD School Relations Center has been fully staffed for over two years. Over that time, your COD Customer Service Representatives (CSRs) have gained a great deal of knowledge and experience. CSRs are eager and ready to build relationships directly with schools. There are a number of tools that alert CSRs to risk areas so they can work with schools to prevent any potential problems and meet regulatory and reporting requirements. Schools also receive support through the following customer service functions:

➢ Support to schools and third party servicers for testing school software applications with the COD System. Further information is available in an Electronic Announcement on IFAP at: http://www.ifap.ed.gov/eannouncements/1223CODSchoolTesting.html**/.**
➢ Support for XML (Common Record) and fixed-length record issues.
➢ Updated version of the COD Computer Based Training available for download on the IFAP web site at:
http://www.ifap.ed.gov/eannouncements/0408CODUpdateCBTWebsiteMarch04.html.
➢ Implementation of the Buddy System to connect Phase-In Participants with current Full Participants to exchange lessons learned and experiences.
➢ COD customer service outreach. A special team of "Early Bird" CSRs monitor batch processing from the previous business day and alert schools to potential issues. Schools are also notified when they have been identified as being impacted by a COD System issue.
➢ Specialized Reconciliation Team to assist schools in reconciliation and closeout.
➢ Updated communications about COD processing and features (DL Bulletin, Pmessage, etc.)
➢ Daily COD Processing Updates available on the COD web site, http://www.cod.ed.gov/.
➢ Updated FAQs to share the answers to questions asked by schools. The FAQs are posted on the COD and IFAP web sites.

Are there other sources of assistance for schools?
Yes. Schools can refer to the Sources for Assistance Guide available on FSA Download at: https://www.fsadownload.ed.gov/SASTechRef.htm. This guide includes helpful contact information for all Student Financial Assistance programs including frequently called help lines, phone numbers, e-mail addresses, and web site addresses that are found in technical references and desk references published by the Department of Education.

Schools can also refer to the COD School Relations and CPS/SAIG- Quick Reference Guide. This reference tool helps schools determine when to contact the COD School Relations Center, Applicant Services Department, vs. CPS/SAIG for assistance. The reference guide is located on the COD web site on the "Today's Update" link, and is labeled "COD School Relations & CPS/SAIG-Quick Reference Guide". Suggestions for additional topics that should be covered in the guide should be e-mailed to CODSupport@acs-inc.com with the subject line of "COD/CPS Guide Recommendations."

The COD Web Site

What functionality does the COD web site provide?
The COD web site, www.cod.ed.gov, is a tool for processing and viewing Pell Grant and Direct Loan data as well as assisting schools with trouble-shooting and problem resolution. The web site provides the ability to access and/or view Pell Grant and Direct Loan reports, allows FSA, schools, third party servicers, and COD customer service to view and use the same award data when questions arise. Note: The COD web site has replaced the RFMS web site and the DLOS web site.

How do schools and third party servicers get access to the COD web site?
To get access to the COD web site, a school must designate a School Security Administrator who is responsible for establishing other users at the institution and other associated procedures.

Schools can refer to the Electronic Announcement on the IFAP web site, http://www.ifap.ed.gov/eannouncements/0422CODWebsiteAccessSchools.html, for information on how to register a School Security Administrator, as well as how to grant access to additional school personnel, modify established accounts, and perform other Security Administrator functions.

Third party servicers are also able to obtain access to the COD web site by referring to the Electronic Announcement on the IFAP web site at: http://ifap.ed.gov/eannouncements/0422CODWebSiteAcce3rdPartyServ.html

How do I reset my user access if I am locked out of the COD System?
Security Administrators are able to unlock the users they have established at their institution. However, if the Security Administrator needs to be unlocked, he/she must contact the COD School Relations Center. The Security Administrator is asked to provide his/her keyword. The keyword is used for security purposes to identify an administrator if he/she is locked out of the COD System or forgets his/her password.

When do COD User IDs become deactivated?
The COD System will deactivate COD User IDs when:
> A first-time COD user who has been assigned a User ID and password has not accessed COD for a consecutive six-month period; and
> An established COD user who has been assigned a User ID and password has not accessed COD for a consecutive three-month period.

School Users 1-4 and Third Party Users 1-4 should contact their System Administrators to reactivate their COD web site User IDs. System Administrators (School User 5 and Third Party User 5) are the only users that need to contact the COD School Relations Center to reactivate their COD web site User IDs. If you have any questions about reactivating your COD web site User ID, please contact the COD School Relations Center.

Is a login name and password required to view data on the COD web site?
COD web site users have the ability to perform school and batch searches, view news and current issues of the daily COD Processing Update without having to log on to the site. However, student or borrower specific information such as Name, SSN, DOB and individual award data is governed by the Privacy Act of 1974, as amended, and is not displayed or made available without a valid log-on User ID and password.

To view data without logging into the COD web site, go to www.cod.ed.gov. Click on the "School Search" or "Batch Search" buttons on the top bar.
> By clicking on School Search, users can enter a school ID or school name to view basic information about the school, such as school name and address, financial aid administrator contacts, and some summary financial information by program type (Pell Grant or Direct Loan).
> By clicking on Batch Search, users can enter a school ID and date range, or a specific batch ID to view the status of a particular batch along with the number of records that have been accepted, rejected, and corrected.

Does the COD web site have security measures in place?
COD has security measures in place to prevent security infringement. The COD System automatically blocks any IP address from accessing the web site if subsequent activity within COD is determined to put the security of the COD environment or data within the COD System at risk. If an IP address is blocked, the COD School Relations Center contacts the COD user.

Additionally, the software used by the COD web site prevents internet browsers (Example: Internet Explorer, Netscape) from storing (or cache) data protected by the Federal Privacy Act on personal computer hard drives. Refer to the Electronic Announcement on IFAP at: http://www.ifap.ed.gov/eannouncements/1124CODWebsitesecurity.html.

How do schools update their contact information on the COD web site?
Schools can update their Pell Grant and/or Direct Loan program's contact information on the COD web site from the School tab and then click on the "Financial Aid Contact" link. COD will display the current information for your institution. You are then able to update or add new financial aid contact information by clicking on the "Update" or "Add New" tab.

Please keep in mind that the Financial Aid Administrator or Director of Financial Aid e-mail address is used to deliver time sensitive materials, containing critical COD processing related information, to your school. Please ensure this contact information contains the most current e-mail address.

Updates to school information such as school name, school address (including branches and locations), names of the Chief Executive Officer/President, Chief Financial Officer, and Director of Financial Aid must be reported by using the Electronic Application for Approval to Participate in Federal Student Financial Aid Programs (E-App) at: http://www.eligcert.ed.gov. Once the information is submitted through E-APP, the COD web site is normally updated with the new information in 24 hours. It may take longer if there is additional information required by Case Management and Oversight Division.

School can also refer to IFAP for information on updating school contact information in COD, http://www.ifap.ed.gov/eannouncements/1126UpdateContacInfoinCODSys.html.

How do schools view Pell Grant and Direct Loan data for concurrent award years on the COD web site?
COD has the capacity to process records for multiple open award years simultaneously. Schools and third party servicers can access the COD web site and view specific award year data by utilizing the award year dropdown box and selecting the desired award year.

The award year dropdown box for the Direct Loan program lists award years 2002-2003 through 2004-2005. The award year dropdown menu for the Pell Grant program lists award years 1999-2000 through 2004-2005. The award year dropdown box is available on the following screens:

➢ Person All Awards Information
➢ Person Pell Information
➢ Person Direct Loan Information
➢ School Search
➢ School Summary Information

➤ School General Information
➤ School Options Information
➤ School Funding Information
➤ School Summary Financial Information
➤ Refunds of Cash Information
➤ Cash Activity
➤ School Yearly Totals
➤ Batch Search

Note: The award year dropdown box on the Person All Awards Information, Person Pell Information, and Person Direct Loan Information screens only displays award years for which the student has an accepted award.

Additionally, once the program and award year are selected from the Default Program and Default Award Year dropdown boxes on the School Search screen, all subsequent School and Program screens will default to and display that program and award year until another default selection is made on the School Search screen or the School Summary screen.

How often is Pell Grant and/or Direct Loan disbursement information updated on the COD web site?
Disbursement information is updated on the COD web site after a school's batch is processed. However, the reflection of the actual disbursements in the school's disbursement totals (for example, Net Accepted and Posted Disbursements and Net Accepted and Posted Disbursements Applied) will not be reflected on the COD web site until after the COD System's overnight processing/posting has been completed.

How are PLUS credit checks performed?
PLUS credit checks can be performed two ways.
➤ Schools can perform an abbreviated credit check by accessing the COD web site Credit Check Search screen at: http://www.cod.ed.gov/. Enter the borrower's social security number and date of birth. Click "Request Credit Check".

➤ The COD System performs a credit check when a PLUS origination is received and a credit check has not been performed within 90 days.

Sending/Receiving Data in the COD Environment

Can we test our system with COD prior to sending production records?
Although most software vendors test with COD prior to the release of their application (including EDExpress), school testing is available to Full Participants as well as third party servicers and

software providers. This affords everyone the opportunity to test their software with the COD System prior to the transmitting and processing of production data.

COD has opened a testing window for the 2005-2006 Award Year. 2005-2006 School Testing registration began December 1, 2004. To participate in software testing for the 2005-2006 Award Year, schools, third party servicers, and software providers must complete and submit a COD School Testing Signup document by May 2, 2005.

Detailed information regarding school testing is available on the COD web site at: www.cod.ed.gov/. Click on the link titled "Click here if you are a school looking for updates on Common Origination and Disbursement." Then click "2005-2006 School Testing Guide and Signup document."

Schools can also refer to the Electronic Announcement posted on the IFAP web site at: http://www.ifap.ed.gov/eannouncements/1223CODSchoolTesting.html/.

Where can schools find information on message classes that are to be used for sending and receiving Pell Grant and Direct Loan records to and from the COD System?
For information regarding 2003-2004 message classes for Full Participants and Phase-In Participants refer to the 2003-2004 COD Technical Reference at https://www.fsadownload.ed.gov/CODTechRef0304.htm.

COD has enhanced message class functionality for Full Participants for the 2004-2005 Award Year. Full Participants will be able to choose from several different message class options in which they can send data to and receive data from the COD System. These message class options include the following:
➢ Non-program specific and non-award year specific
➢ Non-program specific and award year specific
➢ Program specific and award year specific
➢ Program specific and non-award year specific

The complete list of 2004-2005 message classes for Full Participants and Phase-In Participants is available in the COD Technical Reference at: https://www.fsadownload.ed.gov/CODTechRef0405.htm.

Will the Student Aid Internet Gateway (SAIG) Transmission Batch Header for a Response acknowledgement contain the same data that a school submits on an incoming record?
Since COD System implementation for the 2004-2005 Award Year (March 12-14, 2004), COD has increased the batch number on the SAIG Transmission Batch Header from positions 42-67 to 42-91 allowing the entire Full Participant document ID to be returned with the Response. Positions 42-61 are reserved for school use and are returned to schools with the same information submitted on the incoming record. However, positions 62-91 are reserved for use by the

Department. Therefore, any data submitted in positions 62-91 will be overwritten with the Batch/Document ID.

Note: EDConnect users must upgrade to EDConnect version 5.3 or higher in order for their records not to reject. The latest version of EDConnect is 6.0.

Where can schools find information on Country Code values that are submitted in a Common Record document or Phase-In batch?
Schools should refer to the 2003-2004 & 2004-2005 COD Technical References-Volume VIII Section 4, https://www.fsadownload.ed.gov/docsStudentAidGateway.htm, for information on the appropriate Country Code values that are submitted on a Common Record document and Phase-In batch.

Full Participants can also find a complete listing of appropriate country code values in the XML Schema version 2.0c for the 2003-2004 Award Year, http://www.ifap.ed.gov/cod/0210XMLCommonRecordSchema20c.html. For the 2004-2005 Award Year, refer to the XML Schema version 2.0d, http://www.ifap.ed.gov/cod/COD0405CRXMLSchema20d.html.

How are batches acknowledged by COD?
After COD receives a document using the XML Common Record, the system generates a receipt. A receipt is an XML document sent ONLY to Full Participants informing them that COD was able to read the XML document they submitted. Phase-In Participants DO NOT receive a receipt.

COD also responds to each school's data submission files with a response that indicates what data were accepted and what data were rejected. For all 2003-2004 and 2004-2005 Common Record documents, the response is returned in the latest XML Schema version that exists for that award year. Detailed information regarding the XML Schema versions used for Common Record documents is available as an Electronic Announcement on the IFAP web site, http://www.ifap.ed.gov/eannouncements/0310CODSchemaChange0405.html.

For Phase-In Participants, COD returns an acknowledgement to the school in a fixed-length record format, as in past years, so the school's Legacy system can import the file and update its database.

When a Full Participant submits data via the COD web site, the option is available to receive a response via the school's SAIG mailbox. Full Participants will not receive a response for web-based transactions unless they have requested to receive web responses under the COD web site's School Options Information screen. Phase-In Participants will not receive an acknowledgement for web-based transactions.

Do schools and third party servicers have any options about how they receive responses?
Phase-In Participants will receive their responses only in the fixed-length format (still known as Acknowledgements). Full Participants have an option to receive a Full or Standard response for Common Records processed by the COD System. A Full response contains all the original tags (data elements) sent by the school, including any rejected data elements and reason codes. A Standard response contains only the rejected data elements and reason codes.

Depending on the application your school uses, you may be able to choose the response you want to receive by setting this option on the School Options Information screen on the COD web site. EDExpress users will always receive a Full Response. For other schools, if a response option has not been chosen, the option default is the Standard response. Full Participants can also override the standard response default on a record-by-record basis, by submitting the <FullResponseCode> tag on the Common Record.

Can schools determine the maximum number of characters that will be included in each line of an acknowledgement/response?
Only Full Participants can determine the maximum number of characters that will be included in each line of a response. This option is not available to Phase-In Participants. Full Participants can view the "Record Length for XML" field under the COD web site School General Information screen for information on the maximum length of their record.

The "Record Length for XML" field stores the maximum number of characters that will be included in each line of a Common Record response. The default for the 'Record Length for XML' field, for schools will be set to 0. This means that the Common Record responses sent back will contain one tag (data element) per line.

Note: One tag per line makes the response easier to extract information from and read. However, this format returns trailing spaces for a fixed length of 200. To reduce the number of trailing spaces schools may contact COD customer service to change the "Record Length for XML" field to include more than one tag per line.

How will Phase-In Participants update their system if responses are not returned for updates made on the COD web site?
Phase-In Participants that use third party servicers should consult with their third party servicers prior to making updates on the COD web site. Phase-In Participants will not receive acknowledgments for updates on the COD web site and may have to manually update their systems to match the information in COD.

Where can schools and third party servicers view information on a batch submitted to COD?
Schools and third party servicers can view information on a batch submitted to COD by accessing the COD web site's Batch Detail Information screen. The Batch Detail Information screen displays batch statistics and the status of all records in the batch.

Schools and third party servicers can also view the actual data they submitted to COD by accessing the Record Information screen. In addition, the response sent from COD can be viewed by accessing the Response Information screen.

To access the Record Information screen:
➢ Click on the Accepted link under the SSN, Award No, or Disb No columns on the Batch Detail Information screen. The Record Information screen displays.

Or

➢ Click on the Rejected or Accepted with corrections link under the SSN, Award No, or Disb No columns on the Batch Detail Information screen. The Record Errors screen displays.
➢ From the Record Errors screen, click on the View Record button at the bottom of the page to view the data submitted to COD.

To access the Response Information screen:
➢ Click on the Accepted link under the SSN, Award No, or Disb No column on the Batch Detail Information screen. The Record Information screen displays.
➢ From the Record Information screen, click on the View Response button at the bottom of the page. The Response Information screen displays.

Or

➢ Click on the Rejected or Accepted with corrections link under the SSN, Award No, or Disb No column on the Batch Detail Information screen. The Record Errors screen displays. From the Record Errors screen, click on the View Response button at the bottom of the page to view the response COD sent.

How do I correct data in COD?
All Full Participants and Phase-In Participants can make individual student data corrections via batch processing. Full Participants submit changed data while Phase-In Participants submit change records that include the new data element values.

Additionally, Full Participants and MOST Phase-In Participants (check first with your software provider) are able to make individual student data corrections online through the COD web site. Phase-In Participants do not receive acknowledgements from COD for web-based activities. Full Participants do not receive responses for web-based activities unless they have requested the option on the COD web site School Options Information screen.

Additional information on correcting data is available in the 2003-2004 & 2004-2005 COD Technical References at: https://www.fsadownload.ed.gov/docsStudentAidGateway.htm.

Can Common Records be submitted for one program (Example: Pell Grants) and fixed-length records for another (Example: Direct Loan)?
Yes. When schools and servicers submit their Full Participant Request Letter, they must specify the format (XML (Common Record) format or fixed-length format) in which they plan to submit their data for each program. COD uses this information to set processing flags and options for each program.

Information regarding the Full Participant Request Letter for 2004-2005 is available in an Electronic Announcement on IFAP at:
http://www.ifap.ed.gov/eannouncements/1031CODFPSignUpfor0405.html.

For the 2005-2006 Award Year and forward, all schools must participate as a Full Participant for both the Pell and Direct Loan programs. For information regarding the Full Participant Request Letter for 2005-2006, refer to the Electronic Announcement on the IFAP web site at:
http://www.ifap.ed.gov/eannouncements/0806CODFullParticReq0506.html/.

Can schools submit origination and disbursement records simultaneously for the same student?
Yes. Full Participants can submit both origination and disbursement data on the same Common Record for the same student. Phase-In Participants continue to transmit separate origination and disbursement data in specific origination and disbursement batches. Phase-In Participants may transmit origination and disbursement batches together if there is no origination/disbursement already on file.

Phase-In Participants that intend to submit adjusted origination and disbursement batches together are encouraged to wait for the origination acknowledgment before submitting the disbursement batch in to COD for processing.

Can schools update an origination ID after a student record is established in the COD System?
No. One of the benefits of the COD System is a student-centric approach to record processing. Each Award Year, each student recipient, or PLUS borrower, has a single "person" record, even if the student receives both a Pell Grant and a Direct Loan. Once the award, or origination ID, is established in COD, it stays with the student for the entire award year. Further information is available at: http://ifap.ed.gov/eannouncements/0113CODPellOrigID0203.html.

Under what conditions can schools request Pell Administrative Relief (Pell Post Deadline Processing)?
Schools that need to report originations and disbursements for new awards, award amount increases, or disbursement increases after the published Pell processing deadline for an award year must request Pell Administrative Relief or Extended Processing or the records will be rejected by the COD System. A school can request Administrative Relief or Extended Processing via the COD web site or via e-mail.

Note: After the published Pell processing deadline for an award year, the COD System continues to accept and process decreases to previously accepted awards and disbursements. In addition, if a student was in a POP situation during the award year, the COD System continues to accept and process increases and decreases to new awards or previously accepted awards for this student.

For additional information about when the Department can grant Administrative Relief and Extended Processing and how a school can make this request, refer to the Electronic Announcement posted on the IFAP web site at
http://www.ifap.ed.gov/eannouncements/0902PellProcDeadline0304.html.

Promissory Notes

Where do schools send paper Master Promissory Note (MPN) manifests for all award years?
Paper MPN manifests for all award years should be mailed to Montgomery, Alabama for processing. There are two separate mailing addresses, depending on how you choose to send the MPNs. Please use the correct address below to ensure timely receipt of the manifests by the processing center.

Overnight, Express, or Certified Mail should be sent to:
US Department of Education
474 South Court Street, Suite 400
Montgomery, AL 36104

Regular Mail should be sent to:
US Department of Education
P.O. Box 5692
Montgomery, AL 36103-5692

Where do schools send paper MPNs for testing?
Schools that produce MPNs for their students can send MPNs for testing to the following mailing address:

Common Origination and Disbursement
Document Testing
P. O. Box 5691
Montgomery, AL 36103-5691

Documents and shipping packages must be clearly marked "For Testing Only". This ensures MPNs sent for testing are not processed as production MPNs. The processing center reviews the submitted MPNs for accuracy and provides feedback to the school.

What happens to paper MPNs upon receipt by the processing center?
When the processing center receives paper MPNs, two processes are started. First, the shipping manifest is reviewed and compared to the MPNs received. Secondly, the MPNs are reviewed and, if eligible for processing, imaged (screened). All paper MPNs eligible for processing are scanned into the imaging system within three business days of receipt. Once the MPNs are successfully imaged, the manifest is separated from the MPNs, batched, imaged, verified, and returned to the school. During peak processing, it can take up to ten business days for the manifest to be returned to the school.

What happens if an error is found when processing a MPN?
The data is verified to ensure that the MPN was successfully imaged before it is transferred to COD. If an error is found with an imaged MPN, such as a miskey or an error on the MPN itself, the manifest processing is put on hold until the problem is resolved. When an error is identified, only the affected MPN is pulled from the batch and re-processed. The remainder of the batch is considered verified and is released.

What can be done to reduce the number of MPN processing errors?
In order for an MPN to link to an award, data from the MPN must match the same data in the borrower record (SSN, the borrower's date of birth, and the first two characters of the borrower's first name). Both COD and schools can help make sure this data is accurate and matches.

COD uses a double data entry and verification process to minimize data entry errors. The double data entry process allows COD to validate the data from the MPN twice before the data is released for linking to an award.

In cases where any of this data is legally altered on the MPN, but the altered data does not match the borrower record, the MPN does not link to the award. Schools can prevent errors by ensuring that altered data on the MPN is researched and verified against the award data in COD *prior to* submitting the MPN for processing. Hand-written data on MPNs also increases error rates. To ensure that hand-written MPNs are processed correctly, please make certain that hand-written data on the MPN is *legible*.

When a paper MPN cannot be processed due to invalid alteration, it is returned to the school for correction or completion of a new MPN. The shipping manifest is annotated to reflect the reason it was returned to the school. Some reasons for returned MPNs may include a missing signature or no shipping manifest received with the MPN. MPNs are returned to the school as soon as an error is found. The original shipping manifest is returned to the school at a later date.

How does MPN information get into COD?
During the imaging process of the paper MPNs, certain key data elements (SSN, Name, DOB) are gathered into an electronic data file. This file is transmitted along with eMPN data to COD in a real-time method. COD uses the data elements to successfully link the MPN to an eligible award and sends an MPN response/acknowledgment to the school's SAIG mailbox.

When can schools check the status of an MPN on the COD web site?
For paper MPNs, schools do not have to wait until they receive the manifest back before checking the status of an MPN. Once an MPN is successfully imaged, the data is sent to COD. Schools can access the COD web site's Pnote Search screen for information on the status (linked, unlinked, pended or rejected) of an MPN.

It is recommended that schools allow sufficient time for paper MPNs to reach the processing center plus an additional three days for the MPNs to be processed before checking on the status of paper MPNs in COD.

Electronic MPN information is updated in COD throughout the day. When an applicant advises a school that he or she successfully completed an e-MPN, the school can verify that the application process was successful on the DLOS web site, www.lo-online.ed.gov. To do this, select "Master Promissory Note Review" and enter the applicant's SSN and date of birth. If the e-MPN process was successful and the school did not receive an acknowledgement, the school should contact the COD School Relations Center for assistance.

What if a MPN can't be found in COD?
When COD is notified that an MPN is misplaced, is not linked to an award, or is not acknowledged to a school (school does not receive an MPN response/acknowledgement), COD initiates a three- step review process to determine the root cause of the issue.

1) The receipt and routing of the MPN package is traced via the container tracking number (if a school ships paper MPNs via a courier service or registered receipt method). The shipping container number is linked to the package contents throughout the MPN processing cycle.
2) The data in the COD and Imaging Systems is reviewed.
3) COD conducts a physical search for the MPN in the storage vault.

To assist in this search, schools are requested to provide the shipping container tracking number, the date on which the container was signed, the weight of the container, and a copy of the shipping manifest.

Are schools able to require borrowers to complete an MPN electronically?
No. Schools may not require borrowers to complete an MPN electronically. Borrowers may choose to complete a paper MPN. For more information, refer to Direct Loan Bulletin 03-42, http://www.ifap.ed.gov/dlbulletins/DLB0342.html/.

What is a linked/unlinked Master Promissory Note (MPN)?
A linked MPN is an MPN that is associated with an accepted award(s) in COD. An unlinked MPN is an MPN that is not associated with an award(s).
Are there different features of an MPN?
There are 3 different features of an MPN: Multi-Year, Single-Year, and Single-Loan.

Under the Multi-Year (MY) feature, Direct Loan schools may allow their student borrowers (and their parent borrowers under the PLUS MPN) to receive loans for subsequent academic years based upon a valid MPN on file at COD. For details regarding school eligibility for the MY MPN feature refer to the Dear Colleague Letter GEN-02-10, http://www.ifap.ed.gov/dpcletters/Gen0210.html, or DLB 03-07, http://www.ifap.ed.gov/dlbulletins/DLB0307.html.

The Single-Year (SY) MPN feature requires that a new MPN be completed by a student or parent borrower for each academic year. A school using this feature must have a borrower sign an MPN generated by or for that school.

The Single-Loan (SL) MPN feature applies to a PLUS MPN linked to a PLUS loan for which a parent has obtained an endorser who does not have an adverse credit history. The SL MPN is for the one PLUS loan the parent borrows and the endorser agrees to repay if the parent does not repay the loan.

Refer to the 2003-2004 COD Technical Reference- Volume II & IV Section 1 or the 2004-2005 COD Technical References- Volume II Section 1, https://www.fsadownload.ed.gov/docsStudentAidGateway.htm, for details regarding MPN features.

Can multiple loans for a borrower be linked to the same MPN?
Under the MY MPN feature and the SY MPN feature, multiple loans for a borrower can be linked to the same MPN. However, under the SY MPN feature, the academic year start and end dates must be the same on all loans linked to a specific MPN. If the academic year start and end dates

do not match, the loan will not link to the same MPN. As a result, the school will need to obtain a new MPN for the unlinked loan.

Once a Single-Loan (SL) MPN is established for a PLUS loan with an accepted endorser, it becomes inactive. Therefore, no other PLUS loans can be linked to that same PLUS MPN. If a borrower wants to borrow subsequent PLUS loans, he or she needs to sign a new MPN.

The complete business rules surrounding this process are available in the 2003-2004 COD Technical Reference-Volume II & IV Section 1, or the 2004-2005 COD Technical References-Volume II Section 1, https://www.fsadownload.ed.gov/docsStudentAidGateway.htm.

When does a Direct Loan Subsidized/Unsubsidized and PLUS MPN link to an award?
When COD receives an MPN and an accepted subsidized/unsubsidized award is already on file and not yet linked to an MPN, the MPN and the award will be linked. If there are no accepted awards already on file the MPN will not be linked. Given all student data elements on the MPN match the data elements on the award 100%.

When a PLUS MPN is received and an accepted PLUS award with a positive credit check decision is already on file and not linked to an MPN, the PLUS MPN and the PLUS award will be linked. Given all student and borrower (parent) data elements on the MPN match the data elements on the award 100%.

What criteria is used for linking an MPN to a Direct Loan Subsidized/Unsubsidized and PLUS award?
COD links an MPN to an accepted Direct Loan Subsidized/Unsubsidized award using the following student data elements:
  ➢ Current SSN
  ➢ Current Date of Birth
  ➢ First two characters of the first name OR the first two characters of the last name (if the first name is blank or doesn't consist of two alpha characters).

In the case of a PLUS MPN the data elements listed above will be applied to both the borrower (parent) and student.

How is an MPN expiration date calculated?
The MPN expiration date is calculated differently based on the status of the promissory note.

  ➢ For a pending MPN (one that does not yet have an award linked to it), the expiration date is calculated as the date the MPN is received by COD for processing plus 1 year. If the promissory note is not linked within 1 year, it expires. The school will need to obtain a new note from the student if there is no activity within 12 months.

> ➢ For an MPN that has been linked but has no award with an accepted actual disbursement, the expiration date is calculated as the date the MPN is received by COD for processing plus 1 year. If the award linked to the MPN does not have an actual/funded disbursement within 1 year it expires. The school will need to obtain a new note from the student if there is no actual/funded disbursement activity within the first 12 months after COD receives the MPN for processing.
> ➢ For an MPN that has been linked and has at least one award with an accepted actual disbursement, the expiration date is calculated as the date the MPN is received by COD for processing plus 10 years.
> ➢ The COD System accepts an actual disbursement (Full Participant Disbursement Release Indicator = true) for any award linked to an MPN. This occurs, even if the MPN has expired, only when the award is already linked to the MPN and the disbursement successfully passes all other disbursement edits for being accepted by the COD System.

If the accepted disbursement is the first actual disbursement under the MPN and the date of that disbursement is on or before the MPN expiration date, the MPN expiration date is recalculated using the date the MPN was received at COD for processing plus 10 years and the MPN is reactivated (Accepted Status).

What happens if the first actual disbursement is received and the date of that disbursement is after the MPN expiration date?
If the first actual disbursement under the MPN has a date that is after the MPN expiration date, the MPN expiration date remains unchanged and the MPN status remains inactive. A new promissory note is then needed for that disbursement.

Schools can refer to the 2003-2004 COD Technical Reference, https://www.fsadownload.ed.gov/CODTechRef0304.htm, for information regarding the Direct Loan Subsidized/Unsubsidized and PLUS MPN) linking process and calculating the MPN expiration date.

Will the COD System accept subsequent disbursements for an award that is linked to an expired MPN?
The COD system will accept a subsequent disbursement for an award that is linked to an expired MPN. In this case, the MPN expiration date remains unchanged and the MPN status stays the same.

COD Student Identifiers & CPS Matching

What person information is used to establish a student on the COD database?
A student is established on the COD System database once required "person" information is successfully matched to identifying information on the CPS database. For a Pell Grant, the student's Social Security Number, DOB and first two letters of his or her Last Name are compared to CPS data. For a Subsidized/Unsubsidized loan, the student's SSN and DOB are compared to CPS data. If the match is successful, the student is established on the COD database with the COD Student Identifier. The COD Student Identifier consists of the current Social Security Number, current Last Name and DOB. NOTE: The COD Student Identifier differs from the student identifier used for reporting Pell Grants in years past (was Origination ID). For additional information refer to the following link:
http://www.ifap.ed.gov/eannouncements/0113CODPellOrigID0203.html.

Which student identifiers does COD match against the Central Processing System (CPS)?
In addition to comparing student data to CPS to establish a student on the COD database (previous question), COD does a second match with CPS using the award transaction number when establishing awards on the COD database. COD uses the CPS Transaction Number submitted to pull data elements from CPS for processing the award.

When a record contains a new student with a new Pell Grant Award, COD matches the SSN, Date of Birth, first two characters of the Last Name, and the CPS Transaction Number with data from CPS. When a record contains a new student with a Subsidized or Unsubsidized Direct Loan award, COD matches the SSN, Date of Birth, and the CPS Transaction Number with data from CPS.

Refer to the 2003-2004 & 2004-2005 COD Technical References - Volume II Section 1
https://www.fsadownload.ed.gov/docsStudentAidGateway.htm, for complete information on this topic.

How do schools and third party servicers change student identifiers on the CPS and COD System?
In order to change Student Identifier information on the CPS, the school or student must submit a correction to the ISIR/SAR (this will result in a new transaction in CPS). After the correction has been submitted to the CPS, the school must send the changed data to the COD System reporting the old student identifier and the new student identifier (SSN, DOB, or Last Name). COD stores ONLY one Student Identifier for each student; COD does not store separate Student Identifiers for each award.

Where can schools view information the CPS has for students?
Schools may access the COD web site's Applicant search screen to view student information received from CPS via the Abbreviated Applicant file.

Additionally, schools can view ISIR data the CPS has for students via FAA Access to CPS Online web site at: http://www.fafsa.ed.gov/FOTWWebApp/faa/faa.jsp. If you do not have access to the site, the Destination Point Administrator (DPA) for your TG number can register you as a user. Your DPA should go to the SAIG Enrollment Site at http://www.fsawebenroll.ed.gov and select "FAA Administration" to enroll people as FAA Users. All FAA Users will receive a PIN, which is required for access to the FAA Access to CPS Online site.

Keep in mind that student identifiers such as Social Security Number, la st name, and/or date of birth CANNOT be updated online. Updates to student identifiers can be made by the school creating an electronic ISIR correction or by the student submitting a corrected paper SAR. If you have any questions about the FAA Access to CPS Online Web site, please contact CPS/SAIG Technical Support at 800/330-5947 or via e-mail at cpssaig@ed.gov.

Which data elements are pulled from CPS?
The COD System determines if certain data elements are transmitted in Full Participant/Phase-In records or already exist for the student and award year on the COD database. If neither is true, the COD System will 'pull' these data elements from information provided by the CPS.

For each Pell Grant award received, the following data elements are pulled from the CPS information when absent on both the record and the COD database: Address, Loan default/Grant overpayment for student and citizenship status.

For each Direct Loan award received, the following data elements are pulled from the CPS information when absent on both the record and the COD database: Address, Loan default/Grant overpayment for student, citizenship status and Dependency status. Note: Citizenship status cannot be pulled from the CPS for PLUS loans and, therefore, is required on records for PLUS loans.

Frequent COD Data Edits

What resources can schools refer to for information on Pell Grant and Direct Loan edits?
Schools can refer to the 2003-2004 & 2004-2005 COD Technical References, Volume II, III, & IV Section 4 at: https://www.fsadownload.ed.gov/docsStudentAidGateway.htm. Schools can also access the COD web site, www.cod.ed.gov, Help link for information on Pell Grant and Direct Loan edits.

Are the COD data elements and edits the same for all programs?
The COD System takes advantage of commonality across programs to maximize the use of common data elements, edits, and a single student record. Student and parent recipient data, such as name, social security number, date of birth, and other non-program specific data are stored once, so a student/recipient will have one identifier record in COD for all programs. Edits that relate to general school and student eligibility are also the same across programs. However, some program specific data, such as Pell Grant disbursement amounts, do have unique data elements and edits and are applied as warranted.

We received an invalid transaction number error. How do we resolve this error?
Schools will receive an "Invalid Transaction Number" error (Full Participant Edit 024/Phase-In Participant Edit 311) when the Transaction Number reported for a student is not on file on the CPS. To resolve this edit, COD and the school need to first make sure that the CPS Transaction the school is paying on is indeed a valid transaction on the CPS database. If so, COD will need to research the cause of it's absence and obtain the missing data.

Why are we receiving edits for "No eligible SSN, DOB, and last name combination match on CPS for a student"?
Schools will receive Full Participant Edit 011/Direct Loan Phase-In Participant Edit DLO A9/Pell Grant Phase-In Participant Edit 332, 333, 334, "No eligible SSN, DOB, and Last Name Combination Match On CPS for Student" when the Student Identifier (SSN, DOB, and Last Name) reported on the record cannot be found on the CPS. To resolve this edit, schools will need to:
  ➢ Verify the social security number, date of birth or last name submitted with the CPS.
  ➢ Resubmit the record with the correct identifier(s) to COD, or update the CPS and resubmit the record with the CPS transaction number that matches the current identifier.

What are the procedures for correcting duplicate matches on the CPS?
Schools may receive Full Participant Edit 025/Pell Grant Phase-In Participant Edit 338, "Duplicate Match on CPS", after submitting an Origination Record to COD. An Edit 025/338 is an error where the Student Identifier (SSN, DOB, Last Name) and CPS Transaction Number combination reported in the record has two or more matches on the CPS.

To correct Full Participant Edit 025/Phase-In Participant Edit 338, schools can refer to the procedures posted on IFAP at:
http://ifap.ed.gov/eannouncements/0320UpdatedCODEdit025Proc.html.

How should schools resolve an "Invalid Destination Mailbox ID" error?
Schools will receive Full Participant Edit 001/Phase-In Edits 233 and 04 when the Entity ID is invalid or not assigned to send Pell Grant or Direct Loan data from that SAIG Destination Mailbox. Schools can resolve this edit by resubmitting the batch using the appropriate SAIG

Destination Mailbox ID. Contact CPS/SAIG customer service at: 800/330-5947, with concerns regarding the appropriate SAIG Destination Mailbox ID.

Why are we receiving an error indicating that Phase-In Participants cannot submit Common Record documents?
A Phase-In Participant submitting Common Record documents will encounter Edit 107, "Phase-In schools cannot submit Common Record documents for this program and award year", when COD does not reflect Full Participant status for that school.

Schools that intend to submit Common Record documents must first register to become a Full Participant in COD to ensure their records are processed correctly. Refer to IFAP, http://www.ifap.ed.gov/eannouncements/1031CODFPSignUpfor0405.html, for information on 2004-2005 Full Participant registration. Information regarding 2005-2006 Full Participant registration is available at:
http://www.ifap.ed.gov/eannouncements/0806CODFullParticReq0506.html/.

Phase-In Participants that do not intend to become Full Participants must submit records in the fixed-length format using the appropriate Phase-In record layout as described in the 2003-2004 & 2004-2005 COD Technical References, Volume III & IV, section 3, https://www.fsadownload.ed.gov/docsStudentAidGateway.htm.

What edit does COD apply to ensure that Direct Loan disbursement dates are in chronological order?
If a school submits a Direct Loan record with a subsequent disbursement date that is not after the disbursement date of the first disbursement, the record is rejected for COD Edit 052 (First Disbursement Must be the earliest). This edit only applies to Direct Loan and ensures that all anticipated and actual disbursement dates are in chronological order.

What are FSA's operational procedures related to a borrower's pending bankruptcy?
Effective May 3, 2004, FSA changed its operational procedures related to pending bankruptcies based on the fact that each loan and disbursement under a Master Promissory Note (MPN) is clearly identifiable by date and can be identified as having been made before or after a borrower's bankruptcy filing. FSA announced and explained the change in Direct Loan Bulletin 04-14 at http://www.ifap.ed.gov/dlbulletins/DLB0414.html/.
Beginning May 3, 2004, the COD System does not—

➢ Inactivate and flag a borrower's MPNs that were received before the borrower filed for bankruptcy;
➢ Require a new MPN for loans that are made after the borrower filed for bankruptcy (unless the MPN has otherwise expired); and
➢ Reject disbursements that were made after the borrower filed for bankruptcy.

Accordingly, Full Participant Edit 89/Phase-In Edit 60 (when the disbursement date submitted on a record is after the borrower filed for bankruptcy) is no longer applicable.

Reconciliation Tools for Schools

Are reconciliation regulations and requirements the same under COD as they were under DLOS and RFMS?
The COD System has not imposed new reconciliation requirements on schools, nor has it changed. Schools, as always, are required by regulation to report disbursements and changes timely. COD customer service takes a proactive approach in assisting schools with reporting disbursements within the 30-day reporting requirement by performing outreach to schools. CSRs monitor reporting and drawdown activities and work with schools to prevent and resolve potential reconciliation issues. The COD process provides a number of reconciliation tools.

What reconciliation tools does the COD website offer?
The COD web site provides a number of reconciliation tools, including several reports and COD web site financial screens. Financial aid offices and business offices can both view drawdown and reporting activity as well as the data the COD System uses to "age" and "substantiate" the funds drawn. The following screens provide schools with information to assist in the reconciliation process:
  ➢ *School Funding Information* screen provides users with information on a school's total accepted disbursement amount, amounts that were not disbursed, and information schools may use to determine the amount of available funds.
  ➢ *School Summary Financial Information* screen allows users to view a summary of a school's Pell Grant and Direct Loan financial information.
  ➢ *Cash Activity* screen provides users with information on all drawdowns for a particular school.
  ➢ *Yearly Totals* screen provides users with information regarding a school's total awards, total amount disbursed, total number of duplicated recipients, and the total number of unduplicated recipients.

Are there reports available to help schools reconcile?
Yes. There are Direct Loan and Pell Grant reports available to assist schools with their reconciliation processes. The COD System pushes reports to schools' SAIG mailboxes, allows schools to view reports, and fulfill requests for reports via the COD web site and/or batch process.

Full Participants and Phase-In Participants can refer to the COD Technical Reference http://www.fsadownload.ed.gov/CODTechRef0304.htm, for the 2003-2004 report layouts. The list below describes the Direct Loan and Pell Grant reports schools may find useful in the reconciliation process.

Direct Loan Reports:

30-Day Warning Report: The 30-Day Warning report is generated on the first Saturday of each month and is pushed to schools' SAIG mailboxes the following Monday. It is also available on the COD web site. This report lists unbooked Direct Loans for which the COD System has not received one or more of the three the required elements (accepted origination record, disbursement record, and MPN) for "booking" a loan.

Pending Disbursement List: The Pending Disbursement List (formerly the Anticipated Disbursement Listing) is generated weekly and is pushed to schools' SAIG mailboxes on the following Monday. It is also available on the COD web site. Schools can use the Pending Disbursement List report to determine estimated disbursements and disbursement dates on file on the COD System.

Funded Disbursement List: The Funded Disbursement List (formerly the Actual Disbursement Roster) is generated and pushed to schools' SAIG mailboxes daily. This report is also available on the COD web site. The Funded Disbursement List report displays all disbursements that have been funded.

*Duplicate Student Borrower Report***:** The Duplicate Student Borrower report is generated on the first Saturday of each month and is pushed to schools' SAIG mailboxes the following Monday. This report is available on the COD web site. The Duplicate Student Borrower report lists the student borrowers for which the COD System has accepted multiple Direct Loan Subsidized and/or Unsubsidized Award records with the same or overlapping academic years. Schools can see other schools that have submitted a record for a borrower attending their school.

Inactive Loans Report: The Inactive Loan report is produced monthly and is generated on the first Saturday of each month and is pushed to schools' SAIG mailboxes the following Monday. This report is available on the COD web site. The Inactive Loans report lists all Direct Loan awards that have been inactivated (adjusted to $0) by the school for the reporting period. Schools can use this report during the closeout process to verify that their systems' records for inactive or cancelled loans match COD's records.

School Account Statement (SAS): The SAS report is generated on the first Saturday of each month and is pushed to schools' SAIG mailboxes the following Monday. The SAS reports contains COD data on Direct Loan cash balances, cash details, booked loans, and booked or unbooked disbursement transactions. Schools may use the SAS report in conjunction with DL Tools software. Further information regarding DL Tools is available at http://www.ifap.ed.gov/eannouncements/1201dltoolsv31.html.

Note: Schools are able to choose various format options for the 30-Day Warning report, Pending Disbursement List, Funded Disbursement List, Duplicate Student Borrower report, SAS report

and Inactive Loans report by accessing the Report Selection Link under the COD web site School Summary Information screen. School user levels 3-5 have access to select format options via this link.

Prior to making any changes to your school's SAS options, always remember to select the appropriate award year from the Award Year dropdown menu on the Report Selection screen. This will ensure that any changes you make to your school's SAS options are applied to the correct award year.

Further details on customizing your SAS report are available in the 2004-2005 COD Technical Reference, Volume VIII, Section 8, http://www.fsadownload.ed.gov/CODTechRef0405.htm/.

SSN/Name/DOB Change Report: The SSN/Name/DOB Change Report is only produced when a change is made to a student's SSN, Name and DOB. This report is pushed to schools' SAIG mailboxes and is available on the COD web site in the Direct Loan Reports section under the school services tab. This report shows SSN, Name and DOB changes that are initiated by any school, and SSN changes that are initiated by Direct Loan Servicing. Schools can also view changes made to a person by performing a person search on the COD web site. Click on the "Events" tab located on the left side of the screen. This will allow users to view any changes made to the person record.

Note: the Duplicate Student Borrower, Inactive Loans and SSN-Name-Date of Birth Change reports are no longer award year specific. As a result, these reports are not available under the award year specific link (Duplicate Student Borrower 2003-2004, Inactive Loans 2003-2004,and SSN-Name-Date of Birth Change 2003-2004), but can be found under the corresponding non-award year specific link.

In addition to the reports listed above, schools may also use the Compare Program in Direct Loan Tools. The program is helpful to schools when reconciling because it compares SAS data to a school's system data. See the FAQ entitled "What is Direct Loan (DL) Tools?" for more information.

Pell Grant Reports:

We are pleased to announce the availability of five Pell Grant reports that are enhancements to the Common Origination and Disbursement (COD) System for the 2004-2005 Award Year.

Note: The Verification Status Report and the SSN/Name/Date of Birth Change Report were generated and sent for the first time to schools' Student Aid Internet Gateway (SAIG) mailboxes starting November 10, 2004.

Verification Status Report: The Verification Status Report is available for the 2004-2005 Award Year and forward. It is generated monthly on the first Sunday of each month and distributed to schools' SAIG mailboxes (Message Class PGVR05OP) the following Monday and Tuesday. In addition, this report is available on the COD web site and schools can request this report via a Pell Data Request. The report provides a listing and a summary count of disbursed Pell awards for all students selected for verification by the Central Processing System (CPS) for whom the school submitted a verification status code of "W" or blank. The report listing contains new records and previously reported records with the new records listed first. The Verification Status Report is available to QA schools via a school-initiated data request.

Pell POP Report: The Pell POP Report is available for Award Year 2004-2005 and forward (Message Class PGPRxxOP). The report is pushed weekly to schools' COD News Box and is available to schools via a Pell Data Request. The Pell POP Report lists students currently in POP and students no longer in POP for the current award year as well as all schools involved in each POP situation.

SSN/Name/Date of Birth Change Report: The SSN/Name/Date of Birth Change Report is automatically sent to schools' SAIG mailboxes (Message Class PGSNxxOP) on a daily basis, when a person identifier change is initiated. This report is also available via the COD web site. The report lists SSN, Name, and Date of Birth changes on the COD System that are initiated by any school and is sent to all Reporting schools with a Pell award in COD for that student for any of three award years.

Pending Disbursement List: The Pending Disbursement List is sent to schools' SAIG mailboxes (Message Class PGPDxxOP) on a weekly basis for Award Year 2004-2005. This report is also available via the COD web site. The report lists all anticipated disbursements and actual disbursements with a disbursement date between 8 and 30 days in the future on the COD System for a given school.

Funded Disbursement List (Pushed Cash/Just In Time (JIT) Schools Only): The Funded Disbursement List is automatically sent to JIT schools' SAIG mailboxes (Message Class PGFDxxOP) when actual disbursements are funded by COD. This report is also available on the COD web site. The report displays all disbursements that have been funded on a particular date.

For further information on these Pell reports, schools can also refer to Volume VIII, Section 8 of the 2004-2005 COD Technical Reference.

Multiple Reporting Record (MRR): The MRR is produced and pushed to schools' SAIG mailboxes when COD receives disbursement records from multiple schools for the same student whose enrollment dates are within 30 days of each other.

The Multiple Reporting Record (MRR) provides information to schools about a student's Pell Grant origination and disbursement status at other schools/campuses and the amount of the scheduled Pell Grant award disbursed. The MRR is a tool that identifies two primary types of multiple reporting conditions: concurrent enrollment and potential overaward situations.

Schools may request a MRR via the data request batch process (PGRQxxIN) or via the COD web site Batch Search screen. The MRR is also available by request for origination purposes.

Pell Year-to-Date (YTD): The Year-to-Date (YTD) Record shows the number of recipients at the school; the number of award and disbursement records that were accepted, corrected, and rejected; and, for certain edit codes, the number of times a school received that specific edit code on a response document. The YTD Record can be used to replace a corrupt database or to reconcile records with accepted data on COD.

Schools may request a YTD via the data request batch process (PGRQxxIN) or via the COD web site Batch Search screen. The data request is acknowledged to schools via their SAIG mailboxes (PGRAxxOP). The YTD is generated and sent to schools via their SAIG mailboxes (PGYRxxOP).

The YTD record is for Full Participants and Phase-In Participants including schools using EDExpress version 9.2 and forward. Refer to the Electronic Announcement posted on the IFAP web site at http://www.ifap.ed.gov/eannouncements/112522Ann.html/.

Pell Reconciliation: The Pell Reconciliation report is a one-record summary of all records processed by the COD System for a student. This report can be used to reconcile the total disbursement amount per student with COD. This file is provided only in the fixed-length record format and is detailed in it's record layout found in Volume 8 of the 2004-2005 COD Technical Reference available at: http://www.fsadownload.ed.gov/CODTechRef0405.htm/.

Schools may request the Pell Reconciliation file via the data request batch process (PGRQxxIN) or via the COD web site Batch Search screen. The data request is acknowledged to schools via their SAIG mailboxes (PGRAxxOP). The Pell Reconciliation file is generated and sent to schools via their SAIG mailboxes (PGRCxxOP).

 Note: Message Class with "xx" indicates applicable Award Year.

Electronic Statement of Account (ESOA): The ESOA summarizes Pell Grant obligation (CFL) changes and GAPS drawdown activity. In addition, it lists the YTD Unduplicated Recipient Count, YTD Total Accepted and Posted Disbursements and YTD Total Administrative Cost Allowance. The ESOA is pushed to schools' SAIG mailboxes (PGASxxOP) each time the school's CFL is adjusted and upon initial authorization in June prior to the start of an award year.

Starting March 2005, an ESOA will also be pushed to a school's SAIG mailbox when an Administrative Cost Allowance payment is generated for the school.

Schools may also request a ESOA via the data request batch process (PGRQxxIN) or via the COD web site Batch Search screen. The data request is acknowledged to schools via their SAIG mailboxes (PGRAxxOP). The ESOA is generated and sent to schools via their SAIG mailboxes (PGASxxOP).

Note: Message Class with "xx" indicates applicable Award Year.

What if I need information that is not available on the reports listed above?
The COD School Relations Center has the ability to create customized reports (Ad hoc reports) when the standard reports do not provide needed information. Schools should contact the COD School Relations Center for assistance.

What is Direct Loan (DL) Tools?
DL Tools is a stand-alone module of EDExpress software designed to assist Direct Loan schools re-build lost or corrupted loan and/or disbursement data in an EDExpress database, track cash transactions (drawdowns and returns of cash), compare the SAS and/or 732 reports to loans and actual disbursements recorded in EDExpress (or an external file), and/or compare the SAS and/or 732 reports to the DL Tools Cash Database.
DL Tools can be downloaded at: http://www.fsadownload.ed.gov/. Refer to electronic announcement http://www.ifap.ed.gov/eannouncements/1201dltoolsv31.html, for more information on using DL Tools software.

Where do schools send refunds of cash for Title IV funds?
Funds should be returned using the Electronic Refund function in GAPS at: http://e-grants.ed.gov/egHome.asp?APP=. The Electronic Refund function can be accessed from the GAPS 'Main Menu'. For additional information, refer to the refund procedures in the "Frequently Asked Questions" on the GAPS web site.

The Department will continue to accept refund checks. Pell Grant funds for all award years should be returned to:
Department of Education
P.O. Box 952023
St. Louis, MO 63195

Direct Loan funds should be returned to:
COD School Relations Center
P.O. Box 9001
Niagara Falls, NY 14302

For Direct Loan funds, please include a completed Direct Loan Refunds of Cash form with your check, and also note your school code and the award year on the check itself. Refer to DLB 04-06, http://www.ifap.ed.gov/dlbulletins/DLB0406.html, for more information and the Direct Loan refunds of Cash form.

What's new with the Potential Over Award (POP) Project?
Beginning with 2002-2003 Award Year, a change has been implemented to improve the efficiency in which Potential Overaward Project (POP) situations are resolved. This change was implemented in response to numerous schools requesting a new process to resolve POPs that were "blocking" the eligible school and student from receiving funds under the old process. This new process prevents the "blocking" problem by allowing the overaward to exist for 30 days while schools work together to resolve the issue.

When a Pell Grant award has been disbursed by multiple schools, and causes the student to exceed 100% of his or her Scheduled Pell Grant award, COD will notify all schools involved via a Multiple Reporting Record (MRR). Schools must research the student's status, confirm eligibility and reduce disbursements that should not have been made.

If schools do not reconcile POP situations within 30 days, COD will generate a "Negative Disbursement" and reduce ALL disbursements to zero ($0.00) at all involved schools. The eligible school may resubmit actual disbursement data to reinstate the student's award. If multiple schools resubmit disbursements, causing an overpaid status again, COD will send another MRR to all schools involved. To avoid this cyclic situation, schools should collaborate with the corresponding POP affected school(s) and correct the overpayment situation.

Information regarding the business rules pertaining to POP situations is available in the 2003-2004 & 2004-2005 COD Technical References Volume II & III, section 1, https://www.fsadownload.ed.gov/docsStudentAidGateway.htm.

What can schools do to prevent a POP condition from occurring?
Schools should enroll in the NSLDS Transfer Student Monitoring Process. Once a school is enrolled, NSLDS alerts schools to any Pell Grant disbursements made on the student or other changes that could affect the student's eligibility for Title IV student aid. Information regarding the Transfer Student Monitoring process is available as a General Letter on IFAP at: http://www.ifap.ed.gov/dpcletters/GEN0109.html.

Schools can also review the COD web site's Person Pell Information screen to check the Pell Grant Eligibility Used for the student. In order to view this information, schools will need to perform a person search on the Person Search screen using the student's social security number and then click on the Pell link.

On the Multiple Reporting Record (MRR), the Record Type values PB (Blocked Institution), PU (Unblocked Institution), RC (Blocker and Concurrent Enrollment), and BC (Blocked and Concurrent Enrollment) refer to the RFMS terms "Blocked", "Unblocked", and "Blocker". Since schools are no longer "Blocked" and "Unblocked", clarify how these values are defined for award years 2002-2003 and forward.
For award years 2002-2003 and forward, all Record Type values are defined as follows:

> ➤ CE-The student is concurrently enrolled.
> ➤ PB-The student is in a POP condition. The school listed on the MRR was the school **not paid first** that disbursed funds to the student.
> ➤ PR-The student is in a POP condition. The school listed on the MRR was the **first** school that disbursed funds to the student.
> ➤ RC-The student is in a POP condition and is concurrently enrolled. The institution listed in the MRR was not the last institution to disburse funds to the student.
> ➤ PU-The student is no longer in a POP condition.
> ➤ BC-The student is in a POP condition and is concurrently enrolled. The school listed on the MRR was the school **not paid first** that disbursed funds to the student.
> ➤ RC-The student is in a POP condition and is concurrently enrolled. The school listed on the MRR was the **first** school that disbursed funds to the student.

What should a school do if all attempts to work with the corresponding POP school have failed?
COD understands that mediation between schools may be difficult at times. When mediation has failed and the same school(s) continues to submit disbursement records for the same student, schools may contact the COD School Relations Center. COD customer service representatives are available to assist in mediating and escalating POP issues to the Department's FSA Operations area for resolution.